

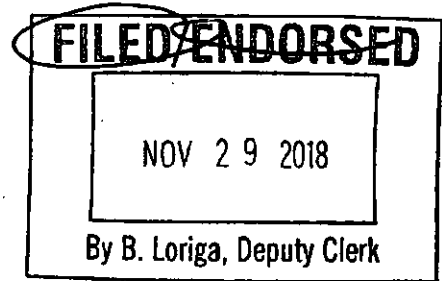
# EXHIBIT C

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**SUPERIOR COURT OF THE STATE OF CALIFORNIA  
FOR THE COUNTY OF SACRAMENTO**

*Coordination Proceeding*  
*Special Title (CRC 3.550)*  
**BUTTE FIRE CASES**

This Document Relates to:

**BARBARA ZELMER, ROBERT  
ZELMER,**  
Plaintiffs,

vs.

**PACIFIC GAS & ELECTRIC COMPANY,**  
et al.,

Defendants.

Assigned to the Honorable Allen H. Sumner  
Department No. 42

CASE NO. JCCP 4853

**STIPULATED JUDGMENT**

The Parties hereby *stipulate* and consent to final judgment resolving the entire case as follows:

WHEREAS, Plaintiffs Barbara Jean Zelmer and Robert Thomas Zelmer (“the Zelmers”) filed complaints against Defendant Pacific Gas & Electric Company (“PG&E”) asserting claims for inverse condemnation, negligence, trespass, public nuisance, private nuisance, negligence per se, premises liability, violation of California Public Utilities Code § 2106, and violation of California Health and Safety Code § 13007, and alleging damage to their home in Calaveras County, California and other property damage as a result of the 2015 Butte Fire;

WHEREAS, the Zelmers have requested dismissal *with prejudice* of their causes of action against PG&E for negligence, trespass, public nuisance, private nuisance, negligence per se, premises liability, violation of California Public Utilities Code § 2106, and violation of California Health and Safety Code § 13007, leaving inverse condemnation as their sole cause of action;

WHEREAS, PG&E denies any liability for the damages claimed by the Zelmers;

WHEREAS, PG&E believes this Court’s June 22, 2017 and May 1, 2018 orders holding PG&E liable for inverse condemnation damages to be prejudicially erroneous and subject to reversal on appeal, but that the expense of trial, both to the court system and the litigants, is unwarranted given the standard for liability under inverse condemnation that was adopted by this Court, including the Court’s rejection of legal arguments made in PG&E’s May 5, 2017 motion and January 4, 2018 Renewed Motion;

WHEREAS, the Parties wish to enter into a stipulated judgment that is final but reserves the right of PG&E to appeal from the June 22, 2017 and May 1, 2018 orders holding PG&E liable in inverse condemnation for damages arising out the Butte Fire;

THEREFORE, the Parties agree that the Court should enter a final judgment

resolving all of Plaintiffs' claims and the entire case consisting of the terms set forth below for the purpose of facilitating PG&E's appeal of the Court's June 22, 2017 and May 1, 2018 orders:

1. Plaintiffs shall take nothing on their claims against Defendant PG&E for negligence, trespass, public nuisance, private nuisance, negligence per se, premises liability, violation of California Public Utilities Code § 2106, and violation of California Health and Safety Code § 130, which have been dismissed;

2. On Plaintiffs' First Cause of Action for Inverse Condemnation in their Complaint and Fourth Cause of Action for Inverse Condemnation in their Adoption Complaint, judgment shall be entered in favor of Plaintiffs and against Defendant PG&E in the amount of \$850,000, inclusive of fees and costs;

3. This stipulated final judgment resolving all of the claims in this case is without prejudice to the rights of PG&E to appeal this final judgment, including the Court's June 22, 2017 order denying PG&E's Motion for a Legal Determination of Inverse Condemnation Liability and its May 1, 2018 order denying PG&E's Renewed Motion for a Legal Determination of Inverse Condemnation Liability;

4. Plaintiffs hereby waive, pursuant to Code of Civil Procedure § 995.230, any requirement that Defendant post an undertaking, bond or security deposit to stay, and they agree not to enforce the Judgment pending appeal from this Judgment.

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IT IS SO STIPULATED

DATED: October 1, 2018

QUINN EMANUEL URQUHART &  
SULLIVAN, LLP

By 

Kenneth R. Chiate  
Jeffrey N. Boozell  
Kristen Bird  
Attorney for Defendants  
Pacific Gas and Electric Company  
and PG&E Corporation

DATED: 9/30, 2018

GILLEON LAW FIRM, APC

By 

Manuel Corrales  
Attorney for the Zelmers

IT IS SO ORDERED.

Dated this 29 day of November, 2018.

By 

HON. ALLEN H. SUMNER  
Judge of the Superior Court